



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AE-17J

DEC 6 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dan Barr
Plant Manager
International Automotive Components Group North America, LLC
1905 Beard Street
Port Huron, Michigan 48060

Re: Notice of Violation
International Automotive Components
Port Huron, Michigan

Dear Mr. Barr:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to International Automotive Components Group North America, LLC (IAC or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Michigan State Implementation Plan at your Port Huron, Michigan facility.

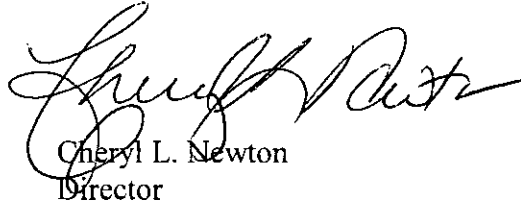
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Molly DeSalle. You may call her at (312) 353-8773 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton", is written over the printed name.

Cheryl L. Newton

Director

Air and Radiation Division

Enclosure

cc: Teresa Seidel, Supervisor,
Michigan Department of Natural Resources and Environment

Standard bcc's: Official File Copy w/Attachment(s)
 Originating Organization Reading File w/Attachment(s)

Other bcc's: Padmavati Bending, C-14J

IN THE MATTER OF:

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EPA-5-11-MI-02

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1. Sections 501 through 507 of the Act, 42 U.S.C. §§ 7661 through 7661f, establishes an operating permit program for major stationary sources and other sources made subject to Section 502(a) of the Act, 42 U.S.C. § 7661a(a).
2. Section 502(a) of the Act provides that after the effective date of any permit program approved or promulgated under this subchapter, “it shall be unlawful for any person to violate any requirement of a permit issued under this subchapter. . .”
3. Pursuant to Section 502(b) of the Act, 42 U.S.C. § 7661a(b), on July 21, 1992, EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. 57 Fed. Reg. 32295 (July 21, 1992). These regulations are codified at 40 C.F.R. Part 70.
4. Section 502(d)(1) of the Act, 42 U.S.C. § 7661a(d)(1), requires that each State develop and submit for EPA’s approval a permit program under State law.
5. On December 4, 2001, EPA granted Michigan full approval of its Clean Air Act Permit Program. 66 Fed. Reg. 62949 (December 4, 2001). The program became effective on November 30, 2001.
6. R 336.1201 of the Michigan SIP states, “a person shall not install, construct, reconstruct, relocate, or alter any process, fuel-burning, or refuse-burning equipment, or control equipment pertaining thereto, which may be a source of an air contaminant, until a permit is issued by the commission. This shall be known as a permit to install and shall cover

construction, reconstruction, relocation, and alteration of equipment where such is involved." 45 Fed. Reg. 29790 (May 6, 1980).

Finding of Facts

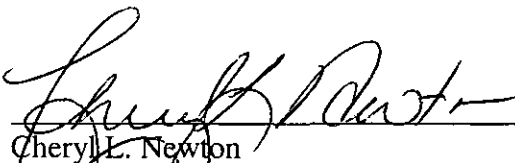
7. IAC owns and operates a headliner manufacturing facility (top panel inside vehicles) at 1905 Beard Street, Port Huron, Michigan.
8. IAC is a "person," as that term is defined in R 336.1116(g), General Provisions Definitions, which is part of the federally enforceable SIP for Michigan. 57 Fed. Reg. 24752 (June 11, 1992).
9. IAC's headliner manufacturing lines are "process equipment," as that term is defined in R 336.1116(n), General Provisions Definitions which is part of the federally enforceable SIP for Michigan. 57 Fed. Reg. 24752 (June 11, 1992).
10. Emissions from IAC's manufacturing process equipment are subject to R 336.1201 in the Michigan SIP. 45 Fed. Reg. 29790 (May 6, 1980).

Violations

11. From April 9, 2007 to present, IAC has been operating unpermitted process equipment at its Port Huron, Michigan facility as required under R 336.1201 of the Michigan SIP. 45 Fed. Reg. 29790 (May 6, 1980). IAC gained ownership of the headliner manufacturing facility in April 2007 from Lear Corporation (Lear) but did not obtain a permit, nor submit an application. The process equipment includes, but is not limited to: six Ucore lines, three AzDel lines, multiple assembly lines, a lamination line, and a foam manufacturing line.

Date

12/3/10


Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Tracy Jamison, certify that I sent a Notice of Violation, No. EPA-5-11-MI-02,

Certified Mail, Return Receipt Requested, to:

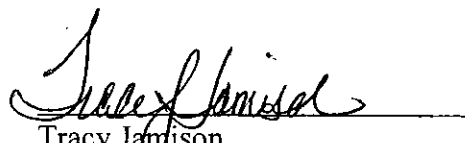
Mr. Dan Barr
Plant Manager
International Automotive Components Group North America, LLC
1905 Beard Street
Port Huron, Michigan 48060

I also certify that I sent copies of the Notice of Violation by first class mail to:

Teresa Seidel, District Supervisor
Michigan Department of Natural Resources and Environment
Southeast District Office
27700 Donald Court
Warren, Michigan 48092

Tom Hess
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909

on the 6 day of December, 2010.


Tracy Jamison,
Office Automation Assistant
AECAS, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 11680 0000 7670 4137